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February 11, 2002

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Ex Parte

William Caton
Acting Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

*RE: Application by Verizon-New England Inc. for Authorization To Provide In-Region,
InterLATA Services in State of Vermont, Docket No. 02-07 – REDACTED*

Dear Mr. Caton:

Per the request of the CCB staff, attached hereto is a table of the number of competitive lines in Vermont by carrier, by mode of entry (facilities-based, resale, or UNE), and by customer type (business or residential). The data in the attached table are a combination of November and December data. We have used December data for E911 listings and November data in all other instances. In addition to the lines contained in the attached table, Verizon has provided approximately 210 xDSL loops to CLECs as of the end of November 2001. See Brown Decl. Att. 1, ¶ 20. CLECs typically use xDSL loops predominantly or exclusively to provide data services. Verizon has no knowledge that any of the lines that are included in the attached table are used predominantly to provide data service. In addition, Verizon has no knowledge that any of the lines that are included in the attached table are part of a market trial or test.

As Verizon explained in its Application, this information is based on data that Verizon maintains in its internal databases. See Brown Decl. Att. 1, ¶ 1. In general, the number of facilities-based lines is based on the number of listings that CLECs have obtained in the E911 database. Id. Att. 1, ¶ 4. This figure provides a conservative estimate of the number of lines that CLECs serve using at least their own switches, because a single E911 listing may represent many individual lines. Id. Verizon determines the number of lines provided *wholly* over CLECs own facilities by subtracting the number of unbundled loops (which is recorded in Verizon's wholesale systems) from the number of E911 listings. The numbers of resale lines, UNE loops, and platforms are

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based on the actual amounts of these lines that CLECs have obtained from Verizon, as recorded in Verizon's wholesale systems.

For resale lines and UNE platforms, Verizon's wholesale systems permit Verizon to determine whether the line is used for residential or business customers. Each E911 listings is classified by the CLEC as a residential or business listing, and Verizon is able to extract that classification when it pulls listings from the E911 database. See Brown Decl. Att. 1, ¶¶ 17, 25. The number of lines provided over UNE loops and the number of lines provided *wholly* over CLECs' own facilities cannot be divided between business or residential customers, because data on unbundled loops are not available on that basis.

For one carrier in Vermont (Adelphia) we have used the number of facilities-based residential White Pages directory listings it has obtained, rather than its residential E911 listings, to calculate the number of facilities-based residential lines it has obtained. Based on a review of Adelphia's E911 listings and directory listings it appears that Adelphia is serving multiple residential customers at a single address. Consistent with this, Adelphia had obtained only a small number of residential E911 listings for that address, but a much large number of facilities-based residential White Pages directory listings. Relying only on Adelphia's residential E911 listings would, therefore, have significantly understated the number of residential customers it is actually serving. As with E911 listings, each facilities-based White Pages directory listing is classified by the CLEC as a residential or business listing so it can be placed in the appropriate section of Verizon's White Pages. In its comments filed in this proceeding, Adelphia does not take issue with any of the line counts provided by Verizon, but asserts that these lines should be classified as business lines. Adelphia Comments at 2. However, these lines are being used by residential end-users (who happen to live in "senior living center situations") who have their own residential directory listings. Adelphia does not, and could not, contest those facts.

Verizon took certain steps to ensure that it was not overstating the number of competitive residential lines in Vermont. First, Verizon removed from the counts of E911 listings and facilities-based white pages directory listings instances where there were multiple listings for a single phone number. Second, Verizon removed lines that, based on the name and address of the customer, appear to serve a business customer despite the residential classification by the CLEC itself to the contrary. At least one carrier, SoverNet, has acknowledged that Verizon's estimates are consistent with the data maintained by CLECs themselves. Compare Brown Decl. Att. 1 ¶ 28 (based on its E911 listings as of December 2001, SoVerNet provides service to approximately ***** residential lines) with SoVerNet Comments at 2; SoVerNet's Elliot Aff. ¶ 8 (as of January 30, 2002, according to both SoVerNet's billing system and its E911 database, SoVerNet had 78 local residential lines).

Finally, staff asked Verizon to explain the reason for the difference in the resold line count in Local Competition Report Table 1 and the Confidential Exhibit B. Confidential Exhibit B to the Local Competition Report (Brown Decl. Att. 1) reflects the number of resold lines provided only by those CLECs that have 10 or more resold lines, whereas Table 1 of that Report counts all resale lines. Furthermore, the sum of business lines in Exhibit B may appear to be greater than the 15,558 lines reported in Table 1 due to rounding.

The entirety of the attachment is proprietary and has been redacted. A confidential version of this letter also is being filed with the attachment. Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-2746.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard T. Bell". The signature is written in a cursive, flowing style.

cc: J. Veach
J. Stanley
G. Remondino